REMARKS

This Application has been carefully reviewed in light of the Office Action mailed October 28, 2004. Claims 1-9, 26, and 28-38 are currently pending.

Section 102 Rejections

Claims 1, 2, 4, 5, 7, 8, and 37 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,608,841 issued to Koodli ("*Koodli*"). Applicants respectfully disagree. *Koodli* does not disclose, or even teach or suggest, at least the following limitations of amended Independent Claim 1:

> receiving at a compressor a flow comprising a plurality of packets, each packet having a packet identifier, the packet identifiers associated with a predetermined increment; and
>
> *ignoring a change* in the predetermined increment associated with the packet identifiers (emphasis added)

With regards to the latter of the above limitations, the Examiner generally states that "changes to packet identifiers are ignored" (Office Action, page 3), citing the following from the Background of the Invention section of *Koodli*:

> All that needs to be communicated is a session context identifier (ID) and a small sequence number (not related to the RTP sequence number) in order to maintain synchronization and detect packet loss between the compressor and de-compressor.

(Column 2, lines 27-31.) This language clearly does not disclose "ignoring a change." To this end, the Examiner is reminded that in a §102 rejection "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Earlier in the same column of the Background of the Invention, *Koodli* indicates the following:

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Typically, the information contained in the compressed packet header includes the difference in change with respect to the value of the field in the previous packet (i.e., only non-zero second-order differences of changing fields), and does not include the changed field itself.

(Column 2, lines 7-12.)

A similar discussion is provided in the detailed description of *Koodli* as to the utilization of this "difference in change":

Second Order Difference is Zero, Use First Order Difference

For header compression operation, the compressor 26 of source terminal 20 starts off by sending full IP/UDP/RTP headers to the de-compressor 36 of destination terminal 30 until the de-compressor 36 establishes a context state for the non-changing fields as well as the first-order difference(s) for the changing fields in the same manner described in RFC 2508. That is, when the context state is established, the compressor 26 of source terminal 20 need not send the first-order differences (especially those corresponding to RTP header fields, for example, such as RTP timestamp and RTP sequence number) unless the second-order difference (delta) is non-zero. *When the second-order difference* (delta) of the RTP header (or IP/UDP header of a data packet) *from packet to packet is zero*, the de-compressor 36 of destination terminal 30 may reconstruct a packet without any loss of information by simply *adding the first-order differences to the saved uncompressed header* representing the previous packet as each compressed packet is received.

(Column 6, line 67-68 and Column 7, lines 1-16, emphasis added.)

Second Order Difference is Non- Zero, Send New First-Order Difference

"When the second-order difference (delta) of the RTP header of any field is non-zero, the compressor 26 of source terminal 20 operates to *send the new first-order difference* of the corresponding field in the manner described in RFC 2508."

(Column 7, lines 17-21, emphasis added.)

A further clarification of utilization of "difference" is also given in *Koodli* as follows:

> Generally, the header compression scheme of the present invention requires that, when a second-order difference of a field is non-zero, not only a particular RTP packet whose second-order difference is non-zero is sent with the new first-order difference, but also those following packets are also sent from the compressor 26 of source terminal 20 with the new first-order difference . . . .

(Column 7, lines 29-36.) Clearly, a difference or change is taken into consideration. Thus, *Koodli* does not disclose, teach, or suggest "ignoring a change" as recited in Claim 1. For at least this reason, Claim 1 is allowable over the cited references.

Independent Claims 1, 4, 7, 26, 37 and 38 recite limitations that are similar, although not identical, to the limitations of Claim 1. Therefore, Claims 1, 4, 7, 26, 37 and 38 are allowable over the cited references for analogous reasons.

Applicants' dependent Claims 2-3, 5-6, 8-9, and 28-36 are allowable based on their dependence on the independent Claims 1, 4, 7, 26 and 37 and further because they recite numerous additional patentable distinctions over the cited reference of the rejection. Because Applicants believe they have amply demonstrated the allowability of independent Claims 1, 4, 7, 26, 37 and 38 over the cited reference of the rejection, and to avoid burdening the record, Applicants have not provided additional detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so. Accordingly, Applicants respectfully request reconsideration and allowance of Claims 1, 2, 4, 5, 7, 8, and 37.

Section 103 Rejections

Claims 3, 6, 9, 26, 28-36, and 38 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Koodli* in view of U.S. Patent No. 6,618,757 issued to Babbitt, et al ("*Babbitt*").

For the reasons presented above, Claims 3, 6, 9, 26, 28-36, and 38 are allowable over *Koodli*, even in light of *Babbit*. Accordingly, Applicants respectfully request reconsideration and allowance of Claims 3, 6, 9, 26, 28-36, and 38.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: _January 28, 2005_

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